

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

MOTION FOR LEAVE TO FILE JOINT MOTION IN RESTRICTED MODE

COMES NOW, Plaintiff, the United States of America, by and through the undersigned, and respectfully requests leave to file the Parties' Joint Motion concerning the appointment of the Special Master in restricted mode for viewing only by the Court and the Parties, in compliance with this Court's Order of December 10, 2018. Doc. 1048. For cause, the United States respectfully states and alleges:

1. On December 10, 2018, the Court directed the Parties to submit at least three proposed subjects for the Special Master "to analyze and provide implementation recommendations to the Court" and a proposed budget for the remainder of FY 2018-2019 and FY 2019-2020 by January 14, 2019.¹ *Id.*

2. The Parties have conferred jointly and with Dr. Alejandro del Carmen regarding the Court's December 10, 2019, Order, and have prepared a Joint Motion to file on today's date. The Joint Motion references matters that are under seal in this case. Accordingly, the

¹ The Court granted the United States' request for a stay of the original deadline due to the lapse in appropriations affecting the Department of Justice and set a new deadline of February 8, 2019. Order, Doc. 1057 (Dec. 27, 2018).

United States seeks leave to file the Joint Motion in restricted mode to protect the restricted material.

WHEREFORE, the United States respectfully requests leave to file the Joint Motion in restricted mode for viewing only by the Court and the Parties.

Respectfully submitted, this 8th day of February, 2019,

STEVEN H. ROSENBAUM
Chief, Special Litigation Section
Civil Rights Division

s/Luis E. Saucedo

TIMOTHY D. MYGATT
Deputy Chief

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th of February, 2019, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record and the Monitor on the service list to be served by electronic means.

s/Luis E. Saucedo

LUIS E. SAUCEDO (G01613)
Counselor to the Chief